

# Industrial User Periodic Compliance Guidance Document

Included is a guidance / instruction sheet to properly complete the Industrial User Periodic Compliance Report. Complete a separate form for each individual outfall identified in your specific industrial wastewater discharge permit.

## Section 1: Identification

List the identification information as requested. Please indicate the sample outfall (this is especially important for facilities with multiple sample points/outfall locations).

## Section 2: Flow Measurement

Total Facility Flow is the summation of both regulated and unregulated flow that is discharged into the sanitary sewer system.

Regulated Flow is the volume measurement of the categorical or non-categorical process. These values can be found on the industrial data summary form.

Unregulated Flow is the volume measurement of domestic waste and/or non-contact cooling water that is discharged into the sanitary sewer system. This flow information can be derived from manhole sampling information, or quarterly water/wastewater billing statements. Unregulated flow measurements can be indirectly calculated by subtracting process flow data from manhole sampling point flow data.

Average GPD is the mean value of all flow data for the six month period.

Maximum GPD is the largest average flow value for the six month period.

Type of Discharge is a brief description of the flow: combined, process (please describe specific process), domestic, non-contact cooling water, etc.

## Section 3: Measurement of Pollutants

Pretreatment Standard is either the categorical, local limits or both found within your specific industrial wastewater discharge permit for each outfall. The applicable concentration standards are also listed on the bottom of the data compilation sheet. Please fill in the effluent limitations applicable to the specific outfall. *Note: Industrial Wastewater Discharge Permit list concentration limits in milligrams per liter (mg/l) while the data compilation sheet may report values in micrograms per liter (µg/l).*

Compliance Sampling values are calculated from laboratory data contained on the industrial data summary form. Average values are derived from the mean monthly values per each parameter. Maximum compliance sampling concentration is the largest reported value for each parameter.

*Note: When calculating averages with values that contain less than (<) or greater than (>) signs, negate the sign and use that numerical value in the calculations. If the calculated average parameter value is less than the reported detection limit (LOD) then report the detection limit value along with the less than sign (<). Calculated average values that fall between the limit of detection and the limit of quantitation (LOQ) must have the results reported within parenthesis" { }".*

Trace metal, total cyanide, total FOG (fats, oils & grease) and TPH (total petroleum hydrocarbon) analyses were analyzed by a commercial laboratory. Various LOD, LOQ values observed depending on dilution factor of sample. Specific sample concentration limits available upon request.

Animal oil and grease values are indirectly calculated from subtracting TPH concentration (FOG-SGT) from the reported total FOG concentration.

Toxic Organic Compound Certification Statement **(ONLY for permittees regulated as metal finisher under 40 CFR Part 433)**

An alternative to routine total toxic organic monitoring is the preparation of a toxic organic management plan (TOMP). A TOMP must specify the toxic organic compounds used, the method of disposal used (instead of discharge into the waste stream), and procedures assuring that toxic organics do not routinely spill or leak into wastewater discharged into the sanitary sewer system. In addition, a certification statement (provided on the compliance report form) must be signed by either the authorized or duly-authorized representative of the user.

*Note: All categorical metal finisher outfalls regulated by 40 CFR Part 433 must complete this section or submit a toxic organic assay results analyzed during the specific six month reporting period. Certain industrial pretreatment participants are required or voluntarily perform routine total toxic organic monitoring can omit signing this section by submitting toxic organic assay results analyzed during the specific six month reporting period. Verify within your specific wastewater discharge permit if organics sampling is required.*

Mercury Minimization Best Management Practices Certification Statement

Industrial users who have previously submitted and satisfied all the requirements associated with the Best Management Practices for Mercury: Industry Mercury Checklist are required to complete the signatory requirements which must be signed by either the authorized or duly-authorized representative of the user to maintain the mercury regulatory standards and requirements waiver identified in [City] sewer use ordinance Sec.40-174(b)(3).

Periodic Compliance Report Certification Statement

All industrial user reports include a certification statement and require a wet ink signature by either the authorized or duly-authorized representative of the user as described in [City] sewer use ordinance Sec.40-304.

Additional Report Information

Please submit copies of any additional wastewater or stormwater analyses performed by either a contract laboratory or an on-site laboratory for the current reporting period.

If you have further questions in regards to completing the Industrial User Periodic Compliance Report, please contact me at (608) 373-3461.

Sincerely,

Marc Zimmerman  
Pretreatment Coordinator  
City of Janesville WWTP

**Form 13**  
**Evaluation Form 2**  
**Guidance for Completing the Industrial User Compliance Evaluation**  
**Worksheet and Determination of Significant Noncompliance**

For background, review pages 3-48 - 3-54 and Appendix A pages A-1 - A-18 of U.S. EPA's guidance manual titled Pretreatment Compliance Monitoring and Enforcement Guidance.

1. Complete one evaluation worksheet for each outfall/sampling location.
2. Include in the evaluation all POTW compliance and IU self-monitoring conducted during each 6-month reporting period (Jan.-June and July-Dec.).
3. Refer to the sewer use ordinance or Control Document for the applicable standards for the regulated pollutants at the sampling location.
4. Review the attached SNC criteria for what constitutes Chronic Violations and Technical Review Criteria (TRC) violations.
5. TOT - Total number of samples taken during the 6-month reporting period.
6. NO. EXCEED - Number of sample results that exceed the maximum daily discharge standard for the parameter.
7. % TOT - Percent of the total number of samples that exceed the maximum daily discharge standard.
8. NO. EXCEED - Number of sample results that exceed the maximum daily discharge standard by 1.2x.

$$\frac{\text{Sample Result}}{\text{Max. Daily Std.}} = \quad \times$$

9. % TOT - Percent of the total number of sample results that exceed the maximum daily discharge standard by 1.2x or greater.
10. Total number of monthly average values based on the sampling for the 6-month period. The average of the samples taken in a calendar month constitutes one average value. This could mean a monthly average based on only one sample or as many as 31 sampling events. Job shop electroplaters are subject to a 4-day average discharge std. rather than a monthly ave. Can use 4 sample days, not necessarily in 1 month.
11. NO. EXCEED - Number of monthly average values that exceed the monthly average discharge standard.
12. % TOT - Percent of the total number of monthly average sample results that exceed the monthly average standard.
13. NO. EXCEED - Number of monthly average sample values that exceed the monthly average discharge standard by 1.2x.
14. % TOT - The percent of the total number of monthly average values that exceed the monthly average discharge standard by 1.2x or greater.

The EPA criteria for determination of significant noncompliance also requires an evaluation of noncompliance with pretreatment requirements other than discharge standards (e.g. not submitting required reports). Review these criteria on page 3-50 of the EPA guidance manual cited above and on the attached SNC criteria and add applicable information to the bottom of the evaluation worksheet.

**TRC Criteria for pH**

Based on the criteria in U.S. EPA's PCME software guidance manual, any exceedance of the upper or lower pH limit by 0.1 pH units is to be used in the TRC consideration.

INDUSTRIAL USER _____		CONTROL DOCUMENT NUMBER _____											
OUTFALL/SAMPLING LOCATION AS DESIGNATED IN CONTROL DOCUMENT 1. _____													
REPORTING PERIOD	STANDARDS	2ND 6 MONTHS											
		1ST 6 MONTHS						2ND 6 MONTHS					
EVALUATION	PARAMETERS	Daily Maximum			Monthly Average			Daily Maximum			Monthly Average		
		Chronic Violations	TRC Violations	TOT	Chronic Violations	TRC Violations	TOT	Chronic Violations	TRC Violations	TOT	Chronic Violations	TRC Violations	TOT
		NO	EXCEED	%	NO	EXCEED	%	NO	EXCEED	%	NO	EXCEED	%
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**Form 13**  
**Evaluation Form 3**  
**Guidance for Completing the Summary of**  
**Industrial User Compliance Status Sheet**

1. Completion of this Summary sheet is based on the information and percentages derived on the COMPLIANCE EVALUATION WORKSHEET.
2. In summarizing compliance, use the following criteria as contained in the attached complete SNC evaluation criteria.
  1. Violations of wastewater discharge limits.
    - a. Chronic violations. 66% or more of the sample results exceed the daily maximum discharge limit or 66% or more of the sample results exceed the monthly average discharge limit in a 6-month reporting period (any magnitude of exceedance).
    - b. Technical Review Criteria (TRC) violations. 33% or more of the sampling results exceed the daily maximum discharge limit or 33% or more of the sampling results exceed the monthly average limit (or 4-day average limit for job shop EPs) by more than the TRC in a 6-month reporting period:

There are 3 groups of TRCs:

Group I for the conventional pollutants (BOD, TSS, fats, oil, and grease)  
TRC = 1.4x

Group II for all other pollutants TRC = 1.2x. pH TRC = Any exceedance of upper or lower limit by 0.4 standard pH units.
  2. See attached complete SNC criteria for other significant noncompliance criteria in regard to noncomplying discharges and not meeting pretreatment requirements such as monitoring and reporting.
3. Compare the Evaluation Worksheet percentages for chronic and TRC violations (both daily maximum and monthly averages) with the above criteria; place one of the following designations in the Chronic and TRC columns on the reverse side based on this comparison:
  - C - Consistent compliance, 100% compliance of sampling results with the applicable daily maximum and monthly average discharge limits.
  - IM - Infrequent or marginal noncompliance is any measure of compliance less than 100%, but not significant noncompliance (SNC) based on USEPA criteria.
  - SNC - Any noncompliance that meets the USEPA criteria for chronic or TRC violations as established above.
4. Use the "Note" section on the right side of Evaluation Form 3 to place applicable information about the noncompliance determination and current compliance and status.

# INDUSTRIAL USER PERIODIC COMPLIANCE REPORT

## JANESVILLE WASTEWATER UTILITY

Period: July through December 2020

### 1) Identification

Company Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

### 2) Flow Measurement - Gallons per Day (GPD)

Average (GPD)	Maximum (GPD)	Type of Discharge
Total Facility Flow		
Regulated Flow		
Unregulated Flow		

### 3) Measurement of Pollutants (based on 24 hr composite, except CN, Oil and Grease & TTO analyses based on grab sample)

*Pretreatment Standard	Daily Monthly or Max.	Phosphorus (mg/l) or lbs	Arsenic (ug/l)	Cadmium (ug/l)	Chromium (ug/l)	Copper (ug/l)	Cyanide (ug/l)	Lead (ug/l)	Mercury (ug/l)	Nickel (ug/l)	Silver (ug/l)	Zinc (ug/l)	Animal / Vegetable Oil & Grease (mg/l)	TPH Oil & Grease (mg/l)	TTO (mg/l)	pH s.u.
		Max.	1,100 ug/l	1,400 ug/l	9,500 ug/l	2,400 ug/l	4,800 ug/l	7,800 ug/l	**	6,300 ug/l	5,400 ug/l	3,100 ug/l	300 mg/l	100 mg/l		5.0 - 10.0
Compliance Sampling	Daily Avg.															
	Daily Max.															
	Monthly Avg.															
	Monthly Max.															

\* = Per Wastewater Notification Package

\*\* = No detectable Total Mercury concentration discharge allowed

Avg. means monthly average

Max. means daily maximum

" < " = result below instrument detection limit  
 " { } " = result value in between LOD and LOQ  
 " N/A " = parameter not analyzed

BOD (mg/l)	TSS (mg/l)
Aggregate Organics and Solid Sampling	Avg. Max.

**Toxic Organic Compound Certification Statement for CILUs promulgated to 40 CFR Part 433 / NR261 Effluent Guidelines for Metal Finishing:**

Based upon my inquiry of the person or the persons directly responsible for managing compliance with pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last periodic compliance report. I further certify that this facility is implementing the toxic organics management plan submitted to the control authority.

signature

Wet ink signature of the authorized or duly-authorized representative of the user

Title \_\_\_\_\_

Date \_\_\_\_\_

**Mercury Minimization Best Management Practices Certification Statement:**

Based upon my inquiry of the person or the persons directly responsible for managing compliance with pretreatment standard for mercury, I certify that, to the best of my knowledge and belief, that the permittee is implementing the best management practices for mercury minimization and source reduction since filing of the last periodic compliance report. I further acknowledge that failure to fully comply with all the best management practices for mercury, as previously submitted to the control authority, will result in permittee outfall(s) to be subject to the mercury regulatory standards and requirements promulgated in [City] ordinance Sec. 40-174.

signature

Wet ink signature of the authorized or duly-authorized representative of the user

Title \_\_\_\_\_

Date \_\_\_\_\_

**Periodic Compliance Report Certification Statement:**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

signature

Wet ink signature of the authorized or duly-authorized representative of the user

Title \_\_\_\_\_

Date \_\_\_\_\_

**Submit copies of all additional wastewater analyses performed by either a commercial laboratory for the current reporting period.**

Form 13  
Evaluation Form 2

# INDUSTRIAL USER COMPLIANCE EVALUATION WORKSHEET

INDUSTRIAL USER \_\_\_\_\_ CONTROL DOCUMENT # \_\_\_\_\_

OUTFALL/SAMPLING LOCATION AS DESIGNATED IN CONTROL DOCUMENT \_\_\_\_\_

REPORTING PERIOD		JANUARY - JUNE								JULY - DECEMBER							
STANDARDS		Daily Maximum				Monthly Average				Daily Maximum				Monthly Average			
EVALUATION	Chronic Violations	TRC Violations	Chronic Violations	TRC Violations	Chronic Violations	TRC Violations	Chronic Violations	TRC Violations	Chronic Violations	TRC Violations	Chronic Violations	TRC Violations	Chronic Violations	TRC Violations			
PARAMETERS	TOT	#	%	TOT	#	%	TOT	#	%	TOT	#	%	TOT	#	%		
Arsenic																	
Cadmium																	
Chromium																	
Copper																	
Lead																	
Nickel																	
Silver																	
Zinc																	
Cyanide																	
TTO																	
pH																	
Oil & Grease - Animal / Vegetable Origin																	
Oil & Grease - TPH Origin																	
Phosphorus																	
Mercury																	

SNC WITH PRETREATMENT REQUIREMENTS

Failure to Monitor	
Failure to Report	
Compliance Schedule	
Violations	

**Form 13  
Evaluation Form 3**

**SUMMARY OF INDUSTRIAL USER COMPLIANCE STATUS**

INDUSTRIAL USER \_\_\_\_\_

OUTFALL \_\_\_\_\_

REPORTING PERIOD	JANUARY - JUNE YEAR: 2020					JULY - DECEMBER YEAR: 2020					NOTES
	Daily Maximum		Monthly Average		Daily Maximum		Monthly Average				
	Chronic	TRC	Chronic	TRC	Chronic	TRC	Chronic	TRC			
STANDARDS											
STATUS											
PARAMETERS											
Arsenic											
Cadmium											
Chromium											
Copper											
Lead											
Nickel											
Silver											
Zinc											
Cyanide											
TTO											
pH											
Oil & Grease - Animal / Vegetable Origin											
Oil & Grease - TPH Origin											
Phosphorus											
Mercury											

**SNC WITH PRETREATMENT REQUIREMENTS**

Failure to Monitor/report			
Compliance Schedule Violations			
Other			